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Attorneys for PAX ASSIST INC.,  
GLOBAL BAGGAGE EXPEDITER,  
INC. and GLOBAL AIRCRAFT  
DISPATCH, INC.

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

MARIO C. ZAPATA, an individual,

Plaintiff,

vs.

DELTA AIR LINES, a corporation;  
GLOBAL BAGGAGE EXPEDITER,  
a corporation; GLOBAL AIRCRAFT  
DISPATCH, a corporation; PAX  
ASSIST, a corporation,

Defendants.

CASE NO. 2:22-cv-04584-MEMF-MRW

**DECLARATION OF YATRICE  
FLEURIMOND IN SUPPORT OF  
DEFENDANTS' MOTION TO  
DISMISS PURSUANT TO FRCP  
12(b)(2), FRCP 12(b)(3), AND FRCP  
12(b)(6), OR IN THE ALTERNATIVE,  
TO TRANSFER VENUE PURSUANT  
TO 28 U.S.C. §§ 1406(a) OR 1404(a)**

Honorable Maame Ewusi-Mensah Primpong

First Street Courthouse,  
350 West 1st Street,  
Los Angeles, California 90012.

Date: Thursday, February 9, 2023

Time: 10:00 a.m.

Courtroom 8B

**DECLARATION OF PAX ASSIST**

I, Yatrice Fleurimond, declare:

1. All the statements contained herein are made and based on my personal knowledge and if called as a witness I could and would testify competently thereto.



**FEDERAL COURT PROOF OF SERVICE**

Zapata v. Delta Airlines, et al.

USDC – Central Case No. 2:22-CV-04584-MEMF-MRW

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On December 2, 2022, I served the following document(s): **DECLARATION OF YATRICE FLEURIMOND IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Mario C. Zapata  
17922 San Fernando Mission Blvd.,  
Room 110B  
Granada Hills, CA 91344  
Email: [mczapata711@gmail.com](mailto:mczapata711@gmail.com)  
Tel: 917-270-4405

The documents were served by the following means:

☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on December 2, 2022, at Los Angeles, California.

/s/ Jong Won Yang

Jong Won Yang